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January 3, 2012

By Fax (212) 805-7986 The Honorable Paul G. Gardephe United States Courthouse 500 Pearl Street New York, N.Y. 10007

USDC SDNY **DOCUMENT** ELECTRONICALLY FILED DOC#: DATE FILED:

Re: Urena et al v. City of New York, et al., 11-cv-03867-PGG

Your Honor:

I represent the plaintiff in this case alleging police misconduct. I write, with defense counsel's consent, to request permission until January 11, 2012 to file an amended complaint in order to name John Doe defendants.

The complaint was not amended by the November 26, 2011 deadline set forth in the scheduling order, because defense counsel first disclosed the identities of the John Doe defendants on December 18, 2011.

Discovery is scheduled to close on January 26, 2012. The parties jointly request an extension of fact discovery until February 26, 2012, as well as an adjournment of the pretrial conference scheduled for January 26, 2012 at 10:15 a.m. This is the parties first request for an extension.

Respectfully,

Robert Marinelli

Cc: Linda Mindrutiu, Esq., by email

J. out 2:36